

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

In re: John Daniel Mangigian, Jr.)
) Case No. 16-35630
) Chapter 13
Debtor.) Trustee: Roy M. Terry
)
)

DEBTOR'S OBJECTION TO PROOF OF CLAIM # 9

The Debtor, John Daniel Mangigian, Jr., by counsel, Nupa Agarwal, Esq., objects to the Proof of Claim filed by Federal National Mortgage Association, in the amount of \$145,502.37 for a pre-petition debt, and assigns the following reasons for the same:

1. Debtor filed a Chapter 13 Bankruptcy on November 16, 2016; and converted to a Chapter 7 on November 13, 2018.
2. Federal National Mortgage Association filed its Proof of Claim on May 1, 2019; and Amended Claim on May 7, 2019.
3. Debtor's Counsel Objects to this Proof of Claim as Federal National Mortgage Association has not shown supporting documents that Debtor was listed on the Mortgage. Debtor states he was only on the Deed.

WHEREFORE, Debtor respectfully requests that this Honorable Court disallow the Proof of Claim # 9 filed by Federal National Mortgage Association and grant such other and further relief as is just and proper.

NOTICE UNDER LOCAL BANKRUPTCY RULE 3007-1, UNLESS A WRITTEN RESPONSE AND A REQUEST FOR HEARING ON THIS OBJECTION ARE FILED WITH THE CLERK OF THE COURT AND SERVED ON THE OBJECTING PARTY AND THE TRUSTEE WITHIN 30 DAYS OF THE SERVICE OF THIS OBJECTION, THE COURT MAY DEEM ANY OPPOSITION WAIVED,

TREAT THE OBJECTION AS CONCEDED, AND ENTER AN ORDER GRANTING THE REQUESTED RELIEF WITHOUT A HEARING.

/s/ John Daniel Mangigian, Jr.

Debtor

By: /s/ Nupa Agarwal

Nupa Agarwal

Counsel for Debtor

VA. State Bar No. 42545

PO Box 17275

Richmond, VA 17275

TEL:(804) 691-2655

PROOF OF SERVICE

I certify that I have this 20th Day of May 2019 transmitted a true copy of the foregoing application electronically through the Court's CM/ECF system or by mail to the Debtor, John Daniel Mangigian, Jr., 2025 Rocky Ford Road, Powhatan, VA 23139; Chapter 7 Trustee, the United States trustee and to all necessary parties, on the mailing matrix maintained by the clerk of court.

/s/Nupa Agarwal
Nupa Agarwal

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

In re: **JOHN DANIEL MANGIGIAN, JR.**) Case No. 16-35630
Debtor.) Chapter 7
) Trustee: Roy M. Terry
)
)

NOTICE OF OBJECTION TO CLAIM # 9

Debtor’s Counsel has filed an objection to the proof of claim #9 by Federal National Mortgage Association (the “Objection”).

Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.

If you do not want the court to grant the relief sought in the Objection or if you want the Court to consider your views on the motion, then you or your attorney must:

File with the court, at the address below a written response to the objection and a request for hearing **within 30 days of filing of this motion**. Unless a written response is filed and served by the date specified, the Court may decide that you do not oppose the objection to your claim. If you mail your response to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above.

Clerk of Court
U.S. Bankruptcy Court
701 E. Broad Street, St. 4000
Richmond, VA 23219

You must also mail a copy to:

Nupa Agarwal
VA. State Bar No. 42545
PO Box 17275
Richmond, VA 17275
TEL:(804) 691-2655

Federal National Mortgage Association Inc
c/o Brad Geisen of Active Data Technologies
1095 Broken Sound Parkway
Suite 100
Boca Raton, FL 33487

If you or your attorney does not take these steps, the court may decide that you do not oppose the objection to your claim and may enter an order granting that relief.

Date: May 20, 2019

/s/ Nupa Agarwal,Esq.
VA. State Bar No. 42545
P.O. Box 17275
Richmond, VA 23226
TEL: 804-691-2655

PROOF OF SERVICE

I certify that I have this 20th Day of May 2019 transmitted a true copy of the foregoing application electronically through the Court's CM/ECF system or by mail to the Debtor, John Daniel Mangigan, Jr., 2025 Rocky Ford Road, Powhatan, VA 23139; Chapter 7 Trustee, the United States trustee and to all necessary parties, on the mailing matrix maintained by the clerk of court.

/s/Nupa Agarwal, Esq
Nupa Agarwal
Counsel for Debtor